

**IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF OKLAHOMA**

<b>IN RE:</b>	)	
	)	
<b>JOE DAVID VICK,</b>	)	
	)	
	)	<b>13-14217-SAH</b>
	)	<b>Chapter 7</b>
<b>Debtor.</b>	)	

**MOTION TO REOPEN CASE AND FOR LEAVE TO FILE AN AMENDED  
SCHEDULE "F" ADDING FOUR (4) NEW CREDITORS WITH NOTICE OF  
OPPORTUNITY FOR HEARING WITH BRIEF COMBINED**

COMES NOW, the above named Debtor, pursuant to 11 U.S.C. Section 350(b) and Fed.R.Bankr.Pro. 5010, and respectfully request this Court reopen this case to allow the Debtor to add new creditors that were previously and inadvertently omitted from the Debtor's original filing.

In support, the Debtor shows the Court the following:

1. That the Movant is the same Debtor in that certain Chapter 7 Bankruptcy filed on September 18, 2013, in the United States Bankruptcy Court for the Western District of Oklahoma, Case No. 13-14217-SAH;
2. That the case was closed on January 16, 2014 and since that time some new medical bills have arrived that the Debtor was unaware of prior to the case being closed.
3. That the Debtor seeks to reopen this case for the purpose of filing an amended Schedule "F" adding 4 new medical bills that pre-date the filing of the bankruptcy case, which were late in arriving and did not arrive before the case was closed.
4. That this an inadvertent omission by the Debtor due to lack of knowledge of the debts prior to discharge and that the Creditors will not be irreparably harmed.
5. That this Court is authorized to reopen this case pursuant to 11 U.S.C. Section 350(b).

6. That this case will not need the appointment of a Trustee by the U.S. Trustee or the Court pursuant to Fed.R.Bankr.Pro. 5010.

#### **NOTICE OF OPPORTUNITY FOR HEARING**

**Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document.** If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, Oklahoma 73102, no later than 14 days from the date of filing of this request for relief. You should also mail a file-stamped copy of your response or objection to the undersigned Creditor/Creditor's attorney [and others who are required to be served] and file a certificate of service with the Court.

If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice. **The 14 day period includes the 3 days allowed for mailing provided for in Rule 9006(f) Fed.R.Bankr.Pro.**

**WHEREFORE**, Debtor prays that this case be reopened for the purpose of adding four (4) new creditors, which were inadvertently omitted and will not harm the Creditors and for such other relief as this Court deems appropriate.

Respectfully submitted,  
/s/ James E. Palinkas  
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**Attorney for the Debtor**

**CERTIFICATE OF TRANSMITTAL**

This is to certify that on the date of filing, a true and correct copy of the above and foregoing was electronically transmitted to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Bankruptcy Trustee  
Susan J. Manchester  
1100 N. Shartel  
Oklahoma City, OK 73103  
[susanmanchester@sbcglobal.net](mailto:susanmanchester@sbcglobal.net)

-and-

U.S. Trustee  
Ustpregion20.oc.ecf@usdoj.gov

**CERTIFICATE OF MAILING**

This is to certify that on the date of filing, a true and correct copy of the above and foregoing document was mailed first class via U.S. Post office, postage fully prepaid, to the Parties in the mailing list attached, and:

Darin R. Haivala, M.D.  
PO Box 248836  
OKC, OK 73124-8836

Norman Healthplex ER Physicians  
3300 Healthplex Pkwy.  
Norman, OK 73071

Norman Regional Hospital  
901 N. Porter  
Norman, OK 73071

Southwest Radiology Associates  
1125 N. Porter, Ste. 100  
Norman, OK 73071

/s/ James E. Palinkas  
JAMES E. PALINKAS, OBA 15037